

OCT 15 2019

JULIA C. DUDLEY, CLERK
BY: [Signature]
DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
HARRISONBURG DIVISION

UNITED STATES OF AMERICA

v.

ADRIAN RAUL O'DELL

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Case No.

5:19CR00036

In Violation of: 18 U.S.C. § 2261A(2)
18 U.S.C. § 875(c)

INDICTMENT

The Grand Jury charges that:

BACKGROUND

1. At all times relevant to this Indictment, defendant, ADRIAN RAUL O'DELL lived in Odessa, Texas, which is within the Western District of Texas.
2. At all times relevant to this Indictment, defendant ADRIAN RAUL O'DELL obtained or had accounts with Gmail, Facebook, Snapchat, and Amino applications, all of which are interactive computer services, electronic communication systems of interstate commerce, and facilities of interstate and foreign commerce.
3. At all times relevant to this Indictment, S.R.G., a 16-year old, and her immediate family, which includes J.G., G.G., N.G., and R.G., lived in Linden, Virginia, which is within the Western District of Virginia.
4. From on or around September 2017, to on or around March 2018, S.R.G. had an online relationship with defendant ADRIAN RAUL O'DELL, with whom she communicated about, among other topics, depression and suicide.
5. On or around April 26, 2018, S.R.G. went missing. For several days, S.R.G.'s whereabouts were unknown.

6. The Warren County Sheriff's Office (WCSO) was the law enforcement agency that led the efforts in locating S.R.G.'s body. On or around May 8, 2018, S.R.G.'s body was found in a heavily wooded area not far from her home in Linden, Virginia. S.R.G. had committed suicide.

7. In or around June 2018, defendant ADRIAN RAUL O'DELL sent an email to the WCSO using a Gmail account, odellgamez@gmail.com. In the email, defendant told a WCSO investigator that he knew who drove S.R.G. to suicide and that the person was "Adrian," who lived in "Odessa, Texas."

8. In or around June 2018, defendant ADRIAN RAUL O'DELL, using Amino, an online social media application, made posts and messaged others also using Amino in which he claimed responsibility and took credit for S.R.G.'s death.

9. In or around August 2018, defendant ADRIAN RAUL O'DELL attempted to communicate with S.R.G.'s family through Facebook Messenger, in which he asked whether they were related to S.R.G.

10. On or around November 29, 2018, an anonymous tip submitted to the Federal Bureau of Investigation (FBI) stated that a suspect "has willingly admitted to killing [S.R.G.]" and that the suspect's name was "Adrian O'Dell" who lived in Odessa, Texas.

11. In or around December 2018, defendant ADRIAN RAUL O'DELL, through a Facebook account named "Amanda Williams," contacted S.R.G.'s family and friends in Facebook Messenger. The defendant, using the "Amanda Williams" account, claimed to be an "ex-friend" of O'Dell and that "Adrian O'Dell" claimed responsibility for S.R.G.'s death. The defendant, using the "Amanda Williams" account, provided screenshots of Snapchat messages,

in which a Snapchat user named "EN" stated how he killed S.R.G. S.R.G.'s family members either did not respond to or blocked the "Amanda Williams" account.

12. In or around December 2018, after the defendant used the "Amanda Williams" account to contact S.R.G.'s friends and family, defendant ADRIAN RAUL O'DELL contacted S.R.G.'s family and friends through other Facebook accounts, two of which were named "Tim Johnson."

13. On or around December 20, 2018, defendant ADRIAN RAUL O'DELL, through the "Tim Johnson" Facebook account, contacted J.G., who is S.R.G.'s mother. In the message, the defendant stated:

Fuck your stupid daughter.
Pathetic piece of shit she was blood, I'm glad I called that hit out on her, I'm glad
I killed her nigga.
Shit was fun to do.
And y'all ain't never caught me and still won't nigga.
Y'all are a bunch of cucks
Posting bout me on here??
You dumb af hoe
**I'll put a 5k bag on your head and have you dead just like I did your fucking
daughter**
I know your exact address hoe
Go ahead and press charges and try and arrest me.
You better hope they do or its ur ass
I'll come to Virginia and blow up yo shit
[GG] too, a bitch a whole bitch nigga
I made his daughter take y'all gun for some fun.
Guess I am Satan
But y'all won't catch me, fuck [S.R.G.];
Fuck you
Give me two months and y'all are gonna be in a coffin nigga
Don't mess with gang shit bruh
You'll end up like your daughter bitch . . .
You're a bad mother you cunt
Don't be proud of shit. . . .
Don't be a dumbass
You never cared for her.
Neither did I, but I put her to rest. **Post about me again and I'll show you wtf
happens.**

(emphasis added).

14. On or around December 28, 2018, defendant ADRIAN RAUL O'DELL, through the "Tim Johnson" Facebook account, contacted R.G., who is S.R.G.'s sister. In the message, defendant stated:

You're a whole bitch, you know that?? You're a fucking cunt, you never cared for your own sister until she died you lying sack of shit, I at least am real, **I didn't give a fuck bout that lil hoe, that's why we fucking killed her, Adrian and all of us.** You think you guys are gonna catch us, y'all won't bruh, y'all bitches, you guys still find Adrian. Still can't after all that fucking effort, a whole ass police investigation. Y'all Stoopid! **I guess we will just keep getting away with it.** You bitches.

(emphasis added).

15. On or around December 28, 2018, to on or around January 9, 2019, defendant ADRIAN RAUL O'DELL, through the "Tim Johnson" Facebook account, contacted N.G., who is S.R.G.'s brother. In these messages, defendant stated:

[NG] boy, you a whole bitch too nigga, we killed [S.R.G.]. What you gonna do about it, hoe ass nigga?

The [S.R.G. family] are a bunch scared bitches.

I'm over here. Where the cops at?

16. On or around December 20, 2018, to on or around January 9, 2019, defendant ADRIAN RAUL O'DELL, through the "Tim Johnson" Facebook account, contacted other relatives and friends of S.R.G. In these contacts, the defendant sent threatening and harassing Facebook messages, including one message in which he stated, "Nigga I did it! Me!!! Adrian Raul O'Dell Nigga!!! I killed that bitch! Called a hit all that!!!"

17. On or around January 15, 2019, defendant ADRIAN RAUL O'DELL was served with a protective order, which prohibited defendant from threatening or contacting J.G., G.G., N.G., and R.G.

18. On or around May 31, 2019, through June 9, 2019, defendant ADRIAN RAUL O'DELL contacted S.R.G.'s father, G.G., through Facebook Messenger using his "Adrian O'Dell" account. In those Facebook messages, defendant ADRIAN RAUL O'DELL stated "#Violated," "Haha," "free," and "You're gonna get gunned down bitch."

19. The subscriber information for the Internet Protocol (IP) addresses associated with the above accounts and messages—i.e. odellgamez@gmail.com; Amino; FBI Tip; and Facebook accounts for "Adrian O'Dell," "Amanda Williams," and "Tim Johnson"—correspond to defendant ADRIAN RAUL O'DELL's residences in Odessa, Texas.

COUNT ONE
(Cyberstalking)

20. Paragraphs 1 through 19 are realleged and incorporated herein.

21. From on or around June 2018 through on or around June 2019, in the Western District of Virginia, and elsewhere, defendant, ADRIAN RAUL O'DELL, with intent to injure, harass, and intimidate, used an interactive computer service and electronic communication systems of interstate commerce, and any other facility of interstate and foreign commerce to engage in a course of conduct that placed J.G., S.R.G.'s mother, in reasonable fear of death and serious bodily injury to J.G. and her immediate family members, and caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to J.G.

22. All in violation of Title 18, United States Code, Section 2261A(2) and 2261(b)(5).

COUNT TWO
(Cyberstalking)

23. Paragraphs 1 through 19 are realleged and incorporated herein.

24. From on or around June 2018 through on or around June 2019, in the Western District of Virginia, and elsewhere, defendant, ADRIAN RAUL O'DELL, with intent to injure, harass, and intimidate, used an interactive computer service and electronic communication systems of interstate commerce, and any other facility of interstate and foreign commerce to engage in a course of conduct that placed R.G., S.R.G.'s sister, in reasonable fear of death and serious bodily injury to R.G. and her immediate family members, and caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to R.G.

25. All in violation of Title 18, United States Code, Section 2261A(2) and Section 2261(b)(5).

COUNT THREE
(Cyberstalking)

26. Paragraphs 1 through 19 are realleged and incorporated herein.

27. From on or around June 2018 through on or around June 2019, in the Western District of Virginia, and elsewhere, defendant, ADRIAN RAUL O'DELL, with intent to injure, harass, or intimidate, used an interactive computer service and electronic communication systems of interstate commerce, and any other facility of interstate and foreign commerce to engage in a course of conduct that placed G.G., S.R.G.'s father, in reasonable fear of death and serious bodily injury to G.G. and his immediate family members, and caused, attempted to cause, and would reasonably be expected to cause substantial emotional distress to G.G.

28. This offense was committed in violation of a protective order.

29. All in violation of Title 18, United States Code, Section 2261A(2) and Section 2261(b)(6).

COUNT FOUR
(Interstate Threats)

30. Paragraphs 1 through 19 are realleged and incorporated herein.

31. On or around December 20, 2018, in the Western District of Virginia, and elsewhere, defendant, ADRIAN RAUL O'DELL, knowingly and willfully transmitted in interstate and foreign commerce a communication containing a threat to injure the person of another, to wit, J.G., for the purpose of issuing the threat and with knowledge that the communication would be interpreted as a threat.

32. All in violation of Title 18, United States Code, Section 875(c).

COUNT FIVE
(Interstate Threats)

33. Paragraphs 1 through 19 are realleged and incorporated herein.

34. On or around June 1, 2019, in the Western District of Virginia, and elsewhere, defendant, ADRIAN RAUL O'DELL, knowingly and willfully transmitted in interstate and foreign commerce a communication containing a threat to injure the person of another, to wit, G.G., for the purpose of issuing the threat and with knowledge that the communication would be interpreted as a threat.

35. All in violation of Title 18, United States Code, Section 875(c).

A TRUE BILL, this 15th day of October 2019

/s/ Foreperson
GRAND JURY FOREPERSON


THOMAS T. CULLEN
UNITED STATES ATTORNEY